SERFF Tracking #: PRUD-131555379 State Tracking #: PRUD-131555379

Company Tracking #: IIGHILTC3RATE-RP-PA

State: Pennsylvania Filing Company: The Prudential Insurance Company of America

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name: Individual Long Term Care Insurance

Project Name/Number: ILTC-3 Re-rate /7I-2018

#### Filing at a Glance

Company: The Prudential Insurance Company of America

Product Name: Individual Long Term Care Insurance

State: Pennsylvania

TOI: LTC03I Individual Long Term Care

Sub-TOI: LTC03I.001 Qualified

Filing Type: Rate - G.I. (Guaranteed Issue)

Date Submitted: 06/25/2018

SERFF Tr Num: PRUD-131555379

SERFF Status: Assigned

State Tr Num: PRUD-131555379

State Status: Received Review in Progress
Co Tr Num: IIGHILTC3RATE-RP-PA

Implementation On Approval

Date Requested:

Author(s): Laura Hughes, Raenonna Prince, Hina Ahmad, Ritu Jain

Reviewer(s): Jim Laverty (primary)

Disposition Date:
Disposition Status:
Implementation Date:

#### State Filing Description:

Proposed aggregate 15.6% rate increase (15.0% if no inflation and 15.8% on policies with automatic inflation) on 1,448 PA policyholders of Prudential forms GRP 113172, GRP 113570, GRP 113172 ED 05/2009, GRP 113570 ED 05/2009 (known as Series ILTC-3).

SERFF Tracking #: PRUD-131555379 State Tracking #: PRUD-131555379 Company Tracking #: IIGHILTC3RATE-RP-PA

State: Pennsylvania Filing Company: The Prudential Insurance Company of America

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name: Individual Long Term Care Insurance

Project Name/Number: ILTC-3 Re-rate /7I-2018

#### **General Information**

Project Name: ILTC-3 Re-rate Status of Filing in Domicile: Not Filed

Project Number: 7I-2018 Date Approved in Domicile:
Requested Filing Mode: Domicile Status Comments:
Explanation for Combination/Other: Market Type: Individual
Submission Type: New Submission Individual Market Type:

Overall Rate Impact: Filing Status Changed: 06/26/2018

State Status Changed: 06/26/2018

Deemer Date: Created By: Raenonna Prince

Submitted By: Raenonna Prince Corresponding Filing Tracking Number:

State TOI: LTC03I Individual Long Term Care

Filing Description:

Please refer to the Filing Cover Letter attached to the Supporting Documentation Tab of this filing.

#### **Company and Contact**

#### **Filing Contact Information**

Keith Burns, Vice President and Actuary keith.burns@prudential.com
Long Term Care Unit 402-715-4861 [Phone]

100 Mulberry Street

Gateway Center 2, 11th Floor

Newark, NJ 07102

#### **Filing Company Information**

The Prudential Insurance CoCode: 68241 State of Domicile: New Jersey

Company of America Group Code: 304 Company Type: Life 751 Broad Street Group Name: State ID Number:

Newark, NJ 07102-3777 FEIN Number: 22-1211670

(973) 802-6000 ext. [Phone]

#### Filing Fees

Fee Required? No Retaliatory? No

Fee Explanation:

SERFF Tracking #: PRUD-131555379 State Tracking #: PRUD-131555379 Company Tracking #: IIGHILTC3RATE-RP-PA

Pennsylvania Filing Company: The Prudential Insurance Company of America State:

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name: Individual Long Term Care Insurance

Project Name/Number: ILTC-3 Re-rate /7I-2018

#### **Rate Information**

Rate data applies to filing.

Filing Method: **SERFF** 

**Rate Change Type:** Increase

**Overall Percentage of Last Rate Revision:** 15.600%

**Effective Date of Last Rate Revision:** 12/01/2016 **SERFF** 

Filing Method of Last Filing:

**SERFF Tracking Number of Last Filing:** PRUD-130398021

#### **Company Rate Information**

| Company                                     | Overall % Indicated | Overall %<br>Rate | Written Premium Change for | Number of Policy<br>Holders Affected | Written<br>Premium for | Maximum %<br>Change | Minimum % Change |
|---|---------------------|-------------------|----------------------------|--------------------------------------|------------------------|---------------------|------------------|
| Name:                                       | Change:             | Impact:           | this Program:              | for this Program:                    | this Program:          | (where req'd):      | (where req'd):   |
| The Prudential Insurance Company of America | 15.600%             | 15.600%           | \$611,707                  | 1,448                                | \$3,912,041            | 15.800%             | 15.000%          |

SERFF Tracking #: PRUD-131555379 State Tracking #: PRUD-131555379 Company Tracking #: IIGHILTC3RATE-RP-PA

State: Pennsylvania Filing Company: The Prudential Insurance Company of America

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name: Individual Long Term Care Insurance

Project Name/Number: ILTC-3 Re-rate /7I-2018

#### Rate/Rule Schedule

|   | em<br>lo. | Schedule<br>Item<br>Status | Document Name                       | Affected Form Numbers (Separated with commas)                              | Rate Action | Rate Action Information   | Attachments                                 |
|---|-----------|----------------------------|-------------------------------------|--|-------------|---|---|
| 1 |           |                            | Appendix D - Rate Pages (PA ILTC-3) | GRP 113172, GRP 113570,<br>GRP 113172 ED 05/2009,<br>GRP 113570 ED 05/2009 | Revised     | Previous State Filing Number:<br>PRUD-130398021<br>Percent Rate Change Request:<br>15.6 | Appendix D - Rate<br>Pages (PA ILTC 3).pdf, |

#### Appendix D

#### The Prudential Insurance Company of America Individual Long Term Care Insurance Plan **Base Rates and Adjustment Factors**

GRP 113172, GRP113172 ED 05/2009, GRP113570 and GRP 113570 ED 05/2009 - For Applications Received Prior to 4/5/2011 Page 1 of 7

#### PENNSYLVANIA BASE RATES BEFORE ADJUSTMENTS

**Gross Annual Premium Per \$10.00 of Facility Care Daily Benefit** Home Care Daily Benefit: 100% of Facility Care Daily Benefit \$1,825 x Daily Benefit Lifetime Maximum Benefit (5 Year Benefit Period) 90 Day Elimination Period

|           |                  |                               |                     | ne Premium Payment                       |  |  |                                    |  |
|-----------|------------------|-------------------------------|---------------------|--|--|--|------------------------------------|--|
|           |                  |                               |                     | Inflatio                                 | n Option                                 |  |                                    |  |
| Issue Age | None             | Guaranteed Purchase<br>Option | 5% Automatic Simple | 5% Automatic<br>Compound<br>(2x Maximum) | 2% Automatic<br>Compound<br>(No Maximum) | 3% Automatic<br>Compound<br>(No Maximum) | 4% Automatic Compound (No Maximum) | 5% Automatic<br>Compound<br>(No Maximum) |
| 18-30     | 63.22            | 67.95                         | 130.07              | 85.41                                    | 100.54                                   | 125.76                                   | 165.96                             | 194.45                                   |
| 31        | 63.88            | 68.68                         | 131.40              | 88.30                                    | 102.03                                   | 128.33                                   | 167.99                             | 196.21                                   |
| 32        | 64.55            | 69.40                         | 132.73              | 91.29                                    | 103.55                                   | 130.97                                   | 170.02                             | 197.98                                   |
| 33        | 65.24            | 70.13                         | 134.08              | 94.38                                    | 105.10                                   | 133.63                                   | 172.07                             | 199.77                                   |
| 34        | 65.92            | 70.87                         | 135.44              | 97.56                                    | 106.67                                   | 136.37                                   | 174.17                             | 201.57                                   |
| 35        | 66.62            | 71.62                         | 136.82              | 100.87                                   | 108.27                                   | 139.16                                   | 176.27                             | 203.40                                   |
| 36        | 67.31            | 72.38                         | 138.21              | 104.29                                   | 109.89                                   | 142.01                                   | 178.41                             | 205.24                                   |
| 37        | 68.02            | 73.14                         | 139.62              | 107.82                                   | 111.53                                   | 144.91                                   | 180.58                             | 207.09                                   |
| 38        | 68.74            | 73.91                         | 141.04              | 111.47                                   | 113.19                                   | 147.88                                   | 182.78                             | 208.96                                   |
| 39        | 69.46            | 74.70                         | 142.47              | 115.24                                   | 114.87                                   | 150.90                                   | 184.98                             | 210.86                                   |
| 40        | 70.20            | 75.49                         | 143.93              | 119.15                                   | 116.59                                   | 153.99                                   | 187.23                             | 212.76                                   |
| 41        | 71.23            | 76.61                         | 146.52              | 122.48                                   | 118.20                                   | 155.72                                   | 189.73                             | 215.60                                   |
| 42        | 72.30            | 77.75                         | 149.17              | 125.90                                   | 119.81                                   | 157.46                                   | 192.26                             | 218.48                                   |
| 43        | 73.38            | 78.91                         | 151.88              | 129.39                                   | 121.46                                   | 159.25                                   | 194.83                             | 221.40                                   |
| 44        | 74.47            | 80.09                         | 154.63              | 133.02                                   | 123.13                                   | 161.03                                   | 197.44                             | 224.35                                   |
| 45        | 75.59            | 81.28                         | 157.43              | 136.74                                   | 124.83                                   | 162.84                                   | 200.07                             | 227.34                                   |
| 46        | 76.71            | 82.49                         | 160.28              | 140.56                                   | 126.53                                   | 164.67                                   | 202.74                             | 230.37                                   |
| 47        | 77.84            | 83.72                         | 163.19              | 144.47                                   | 128.28                                   | 166.52                                   | 205.44                             | 233.45                                   |
| 48        | 79.02            | 84.97                         | 166.14              | 148.51                                   | 130.03                                   | 168.41                                   | 208.17                             | 236.56                                   |
| 49        | 80.19            | 86.24                         | 169.14              | 152.66                                   | 131.82                                   | 170.28                                   | 210.95                             | 239.72                                   |
| 50        | 81.39            | 87.52                         | 172.21              | 156.93                                   | 133.63                                   | 172.21                                   | 213.78                             | 242.93                                   |
| 51        | 85.26            | 91.68                         | 180.71              | 165.51                                   | 139.92                                   | 179.79                                   | 221.73                             | 251.39                                   |
| 52        | 89.31            | 96.03                         | 189.65              | 174.57                                   | 146.51                                   | 187.70                                   | 229.98                             | 260.14                                   |
| 53        | 93.55            | 100.59                        | 199.00              | 184.11                                   | 153.40                                   | 195.97                                   | 238.54                             | 269.24                                   |
| 54        | 98.00            | 105.36                        | 208.85              | 194.19                                   | 160.61                                   | 204.58                                   | 247.41                             | 278.63                                   |
| 55        | 102.66           | 110.38                        | 219.16              | 204.80                                   | 168.16                                   | 213.60                                   | 256.61                             | 288.33                                   |
| 56        | 107.53           | 115.62                        | 229.98              | 216.01                                   | 176.07                                   | 223.02                                   | 266.17                             | 298.38                                   |
| 57        | 112.63           | 121.11                        | 241.34              | 227.84                                   | 184.34                                   | 232.84                                   | 276.08                             | 308.80                                   |
| 58        | 117.99           | 126.87                        | 253.27              | 240.29                                   | 193.02                                   | 243.08                                   | 286.33                             | 319.56                                   |
| 59        | 123.59           | 132.89                        | 265.78              | 253.43                                   | 202.11                                   | 253.78                                   | 296.98                             | 330.72                                   |
| 60        | 129.46           | 139.20                        | 278.90              | 267.30                                   | 211.61                                   | 264.95                                   | 308.04                             | 342.26                                   |
| 61        | 139.77           | 150.28                        | 297.61              | 288.86                                   | 227.76                                   | 281.53                                   | 326.23                             | 362.47                                   |
| 62        | 150.89           | 162.24                        | 317.56              | 312.17                                   | 245.13                                   | 299.13                                   | 345.51                             | 383.90                                   |
| 63        | 162.90           | 175.16                        | 338.85              | 337.37                                   | 263.82                                   | 317.82                                   | 365.92                             | 406.57                                   |
| 64        | 175.86           | 189.08                        | 361.59              | 364.61                                   | 283.93                                   | 337.71                                   | 387.55                             | 430.60                                   |
| 65        | 189.85           | 204.14                        | 385.83              | 394.03                                   | 305.58                                   | 358.83                                   | 410.44                             | 456.06                                   |
| 66        | 210.40           | 226.25                        | 423.32              | 432.04                                   | 335.96                                   | 392.84                                   | 447.36                             | 494.88                                   |
| 67        | 233.19           | 250.75                        | 464.44              | 473.73                                   | 369.34                                   | 430.07                                   | 487.60                             | 537.02                                   |
| 68        | 258.45           | 277.91                        | 509.57              | 519.43                                   | 406.03                                   | 470.84                                   | 531.45                             | 582.76                                   |
| 69        | 286.43           | 308.00                        | 559.07              | 569.54                                   | 446.36                                   | 515.46                                   | 579.27                             | 632.40                                   |
| 70        | 317.47           | 341.37                        | 613.38              | 624.49                                   | 490.71                                   | 564.32                                   | 631.35                             | 686.25                                   |
| 71<br>72  | 355.97<br>399.14 | 382.77<br>429.19              | 681.49<br>757.16    | 695.58<br>774.75                         | 549.49<br>615.31                         | 628.34<br>699.61                         | 698.01<br>771.69                   | 755.43<br>831.61                         |
| 73        | 447.56           | 481.24                        | 841.23              | 862.93                                   | 689.00                                   | 778.96                                   | 853.17                             | 915.47                                   |
| 74        | 501.84           | 539.63                        | 934.63              | 961.16                                   | 771.53                                   | 867.33                                   | 943.24                             | 1,007.76                                 |
| 75        | 562.71           | 605.07                        | 1,038.40            | 1,070.56                                 | 863.94                                   | 965.71                                   | 1,042.81                           | 1,109.39                                 |
| 76        | 625.14           | 672.21                        | 1,038.40            | 1,180.11                                 | 956.07                                   | 1,066.65                                 | 1,146.61                           | 1,109.39                                 |
| 76        | 694.51           | 746.80                        | 1,146.94            | 1,300.86                                 | 1,058.04                                 | 1,178.15                                 | 1,140.01                           | 1,328.97                                 |
| 78        | 771.57           | 829.66                        | 1,399.25            | 1,433.96                                 | 1,170.88                                 | 1,301.30                                 | 1,386.20                           | 1,454.56                                 |
| 79        | 857.18           | 921.71                        | 1,545.51            | 1,580.70                                 | 1,295.74                                 | 1,437.32                                 | 1,524.15                           | 1,592.02                                 |

GRP 113172, GRP113172 ED 05/2009, GRP113570 and GRP 113570 ED 05/2009 - For Applications Received Prior to 4/5/2011 Page 2 of 7

#### PENNSYLVANIA BASE RATES BEFORE ADJUSTMENTS

Gross Annual Premium Per \$10.00 of Facility Care Daily Benefit
Home Care Daily Benefit: 100% of Facility Care Daily Benefit
\$1,825 x Daily Benefit Lifetime Maximum Benefit (5 Year Benefit Period)
90 Day Elimination Period

|           |        | -                   | 10-Year Paid Up                          | -04                                |                                    |                                    |  |
|-----------|--------|---------------------|--|------------------------------------|------------------------------------|------------------------------------|--|
|           |        |                     |  | n Option                           |                                    |                                    |  |
| Issue Age | None   | 5% Automatic Simple | 5% Automatic<br>Compound<br>(2x Maximum) | 2% Automatic Compound (No Maximum) | 3% Automatic Compound (No Maximum) | 4% Automatic Compound (No Maximum) | 5% Automatic<br>Compound<br>(No Maximum) |
| 18-40     | 209.51 | 463.83              | 519.51                                   | 387.10                             | 573.70                             | 763.24                             | 927.71                                   |
| 41        | 210.32 | 471.27              | 522.88                                   | 386.91                             | 570.25                             | 758.50                             | 920.48                                   |
| 42        | 211.13 | 478.84              | 526.26                                   | 386.75                             | 566.81                             | 753.79                             | 913.30                                   |
| 43        | 211.93 | 486.55              | 529.69                                   | 386.56                             | 563.39                             | 749.10                             | 906.18                                   |
| 44        | 212.75 | 494.37              | 533.12                                   | 386.40                             | 560.01                             | 744.44                             | 899.11                                   |
| 45        | 213.57 | 502.31              | 536.57                                   | 386.23                             | 556.62                             | 739.82                             | 892.11                                   |
| 46        | 214.39 | 510.38              | 540.04                                   | 386.04                             | 553.27                             | 735.24                             | 885.15                                   |
| 47        | 215.21 | 518.59              | 543.54                                   | 385.88                             | 549.93                             | 730.67                             | 878.25                                   |
| 48        | 216.04 | 526.92              | 547.06                                   | 385.70                             | 546.63                             | 726.14                             | 871.40                                   |
| 49        | 216.87 | 535.39              | 550.62                                   | 385.53                             | 543.33                             | 721.62                             | 864.61                                   |
| 50        | 217.71 | 543.99              | 554.18                                   | 385.36                             | 540.06                             | 717.14                             | 857.86                                   |
| 51        | 223.18 | 552.75              | 568.07                                   | 394.07                             | 549.52                             | 723.77                             | 862.83                                   |
| 52        | 228.79 | 561.65              | 582.31                                   | 402.97                             | 559.15                             | 730.45                             | 867.83                                   |
| 53        | 234.54 | 570.70              | 596.90                                   | 412.10                             | 568.94                             | 737.21                             | 872.87                                   |
| 54        | 240.44 | 579.88              | 611.86                                   | 421.42                             | 578.91                             | 744.02                             | 877.91                                   |
| 55        | 246.47 | 589.21              | 627.21                                   | 430.94                             | 589.05                             | 750.91                             | 883.02                                   |
| 56        | 252.67 | 598.69              | 642.93                                   | 440.68                             | 599.36                             | 757.84                             | 888.14                                   |
| 57        | 259.03 | 608.33              | 659.04                                   | 450.65                             | 609.86                             | 764.84                             | 893.27                                   |
| 58        | 265.54 | 618.12              | 675.57                                   | 460.84                             | 620.55                             | 771.91                             | 898.46                                   |
| 59        | 272.21 | 628.08              | 692.48                                   | 471.26                             | 631.42                             | 779.04                             | 903.66                                   |
| 60        | 279.05 | 638.17              | 709.84                                   | 481.91                             | 642.48                             | 786.24                             | 908.90                                   |
| 61        | 292.48 | 660.60              | 738.46                                   | 502.38                             | 659.47                             | 802.80                             | 926.62                                   |
| 62        | 306.58 | 683.82              | 768.23                                   | 523.68                             | 676.93                             | 819.69                             | 944.70                                   |
| 63        | 321.33 | 707.85              | 799.19                                   | 545.93                             | 694.83                             | 836.93                             | 963.13                                   |
| 64        | 336.82 | 732.71              | 831.40                                   | 569.09                             | 713.21                             | 854.53                             | 981.90                                   |
| 65        | 353.04 | 758.46              | 864.91                                   | 593.25                             | 732.09                             | 872.53                             | 1,001.04                                 |
| 66        | 378.28 | 804.08              | 897.24                                   | 626.95                             | 765.44                             | 903.43                             | 1,027.75                                 |
| 67        | 405.34 | 852.45              | 930.75                                   | 662.56                             | 800.31                             | 935.43                             | 1,055.16                                 |
| 68        | 434.34 | 903.75              | 965.56                                   | 700.20                             | 836.78                             | 968.56                             | 1,083.29                                 |
| 69        | 465.41 | 958.13              | 1,001.65                                 | 739.96                             | 874.89                             | 1,002.87                           | 1,112.19                                 |
| 70        | 498.70 | 1,015.77            | 1,039.08                                 | 781.99                             | 914.75                             | 1,038.40                           | 1,141.85                                 |
| 71        | 543.28 | 1,096.32            | 1,123.24                                 | 850.50                             | 988.96                             | 1,114.42                           | 1,219.93                                 |
| 72        | 591.84 | 1,183.29            | 1,214.22                                 | 925.02                             | 1,069.18                           | 1,195.99                           | 1,303.35                                 |
| 73        | 644.74 | 1,277.16            | 1,312.57                                 | 1,006.07                           | 1,155.90                           | 1,283.56                           | 1,392.50                                 |
| 74        | 702.35 | 1,378.46            | 1,418.90                                 | 1,094.21                           | 1,249.69                           | 1,377.52                           | 1,487.71                                 |
| 75        | 765.12 | 1,487.80            | 1,533.82                                 | 1,190.09                           | 1,351.06                           | 1,478.36                           | 1,589.45                                 |

GRP 113172, GRP113172 ED 05/2009, GRP113570 and GRP 113570 ED 05/2009 - For Applications Received Prior to 4/5/2011 Page 3 of 7

#### PENNSYLVANIA BASE RATES BEFORE ADJUSTMENTS

Gross Annual Premium Per \$10.00 of Facility Care Daily Benefit
Home Care Daily Benefit: 100% of Facility Care Daily Benefit
\$1,825 x Daily Benefit Lifetime Maximum Benefit (5 Year Benefit Period)
90 Day Elimination Period

Paid Un at 65

|           |        |                     | Paid Up at 65         |                          |                       |                       |                       |
|-----------|--------|---------------------|-----------------------|--------------------------|-----------------------|-----------------------|-----------------------|
|           |        |                     | Inflatio              | n Option                 |                       |                       |                       |
| Issue Age | None   | 5% Automatic Simple | 5% Automatic Compound | 2% Automatic<br>Compound | 3% Automatic Compound | 4% Automatic Compound | 5% Automatic Compound |
| 10.20     | 110.74 | 272.21              | (2x Maximum)          | (No Maximum)             | (No Maximum)          | (No Maximum)          | (No Maximum)          |
| 18-30     | 118.74 | 272.21              | 196.35                | 209.62                   | 303.89                | 378.53                | 447.05                |
| 31        | 119.34 | 273.61              | 202.86                | 210.80                   | 305.08                | 381.38                | 450.80                |
| 32        | 119.96 | 275.00              | 209.59                | 212.03                   | 306.26                | 384.26                | 454.56                |
| 33        | 120.57 | 276.43              | 216.55                | 213.22                   | 307.46                | 387.18                | 458.37                |
| 34        | 121.19 | 277.84              | 223.71                | 214.44                   | 308.64                | 390.12                | 462.20                |
| 35        | 121.82 | 279.27              | 231.14                | 215.68                   | 309.85                | 393.07                | 466.07                |
| 36        | 122.44 | 280.71              | 238.80                | 216.92                   | 311.06                | 396.04                | 469.97                |
| 37        | 123.07 | 282.16              | 246.72                | 218.14                   | 312.25                | 399.04                | 473.91                |
| 38        | 123.71 | 283.62              | 254.91                | 219.39                   | 313.48                | 402.06                | 477.88                |
| 39        | 124.34 | 285.06              | 263.36                | 220.65                   | 314.70                | 405.09                | 481.88                |
| 40        | 124.98 | 286.54              | 272.11                | 221.90                   | 315.93                | 408.16                | 485.92                |
| 41        | 128.72 | 296.05              | 284.17                | 228.35                   | 324.41                | 420.13                | 500.26                |
| 42        | 132.55 | 305.91              | 296.78                | 234.97                   | 333.13                | 432.46                | 515.03                |
| 43        | 136.51 | 316.08              | 309.94                | 241.79                   | 342.11                | 445.12                | 530.26                |
| 44        | 140.58 | 326.58              | 323.68                | 248.81                   | 351.29                | 458.19                | 545.92                |
| 45        | 144.79 | 337.44              | 338.04                | 256.03                   | 360.75                | 471.63                | 562.04                |
| 46        | 149.10 | 348.66              | 353.03                | 263.47                   | 370.46                | 485.45                | 578.63                |
| 47        | 153.55 | 360.25              | 368.68                | 271.12                   | 380.41                | 499.69                | 595.72                |
| 48        | 158.14 | 372.23              | 385.05                | 279.00                   | 390.65                | 514.33                | 613.33                |
| 49        | 162.85 | 384.59              | 402.13                | 287.08                   | 401.15                | 529.43                | 631.43                |
| 50        | 167.72 | 397.39              | 419.96                | 295.42                   | 411.92                | 544.94                | 650.10                |
| 51        | 181.14 | 429.95              | 455.04                | 318.60                   | 442.47                | 581.03                | 691.15                |
| 52        | 195.64 | 465.19              | 493.05                | 343.58                   | 475.29                | 619.50                | 734.81                |
| 53        | 211.29 | 503.32              | 534.22                | 370.54                   | 510.53                | 660.52                | 781.22                |
| 54        | 228.21 | 544.58              | 578.85                | 399.59                   | 548.38                | 704.26                | 830.56                |

GRP 113172, GRP113172 ED 05/2009, GRP113570 and GRP 113570 ED 05/2009 - For Applications Received Prior to 4/5/2011 Page 4 of 7

#### PENNSYLVANIA BASE RATES BEFORE ADJUSTMENTS

Gross Annual Premium Per \$10.00 of Facility Care Daily Benefit
Home Care Daily Benefit: 100% of Facility Care Daily Benefit
\$1,825 x Daily Benefit Lifetime Maximum Benefit (5 Year Benefit Period)
90 Day Elimination Period

Premium Decrease at 65

|           |        | P                   | Premium Decrease at                      | 65                                 |                                    |                                    |  |  |  |  |  |  |
|-----------|--------|---------------------|--|------------------------------------|------------------------------------|------------------------------------|--|--|--|--|--|--|
|           |        | Inflation Option    |  |                                    |                                    |                                    |  |  |  |  |  |  |
| Issue Age | None   | 5% Automatic Simple | 5% Automatic<br>Compound<br>(2x Maximum) | 2% Automatic Compound (No Maximum) | 3% Automatic Compound (No Maximum) | 4% Automatic Compound (No Maximum) | 5% Automatic<br>Compound<br>(No Maximum) |  |  |  |  |  |
| 18-30     | 72.70  | 156.08              | 115.29                                   | 126.87                             | 181.60                             | 223.95                             | 262.52                                   |  |  |  |  |  |
| 31        | 73.77  | 158.31              | 119.63                                   | 128.62                             | 183.47                             | 226.82                             | 265.85                                   |  |  |  |  |  |
| 32        | 74.88  | 160.58              | 124.13                                   | 130.40                             | 185.37                             | 229.71                             | 269.24                                   |  |  |  |  |  |
| 33        | 75.98  | 162.86              | 128.80                                   | 132.22                             | 187.32                             | 232.67                             | 272.65                                   |  |  |  |  |  |
| 34        | 77.12  | 165.20              | 133.66                                   | 134.05                             | 189.26                             | 235.65                             | 276.13                                   |  |  |  |  |  |
| 35        | 78.26  | 167.57              | 138.67                                   | 135.90                             | 191.23                             | 238.68                             | 279.62                                   |  |  |  |  |  |
| 36        | 79.42  | 169.95              | 143.89                                   | 137.79                             | 193.21                             | 241.74                             | 283.18                                   |  |  |  |  |  |
| 37        | 80.59  | 172.39              | 149.31                                   | 139.70                             | 195.22                             | 244.85                             | 286.78                                   |  |  |  |  |  |
| 38        | 81.79  | 174.86              | 154.93                                   | 141.63                             | 197.25                             | 247.97                             | 290.41                                   |  |  |  |  |  |
| 39        | 83.00  | 177.36              | 160.75                                   | 143.60                             | 199.30                             | 251.16                             | 294.12                                   |  |  |  |  |  |
| 40        | 84.24  | 179.90              | 166.80                                   | 145.60                             | 201.36                             | 254.38                             | 297.85                                   |  |  |  |  |  |
| 41        | 85.85  | 184.56              | 172.06                                   | 148.18                             | 204.41                             | 258.72                             | 302.89                                   |  |  |  |  |  |
| 42        | 87.48  | 189.37              | 177.49                                   | 150.81                             | 207.47                             | 263.12                             | 308.00                                   |  |  |  |  |  |
| 43        | 89.15  | 194.28              | 183.08                                   | 153.48                             | 210.59                             | 267.59                             | 313.22                                   |  |  |  |  |  |
| 44        | 90.84  | 199.31              | 188.86                                   | 156.19                             | 213.76                             | 272.14                             | 318.51                                   |  |  |  |  |  |
| 45        | 92.58  | 204.50              | 194.82                                   | 158.97                             | 216.97                             | 276.77                             | 323.90                                   |  |  |  |  |  |
| 46        | 94.33  | 209.81              | 200.95                                   | 161.78                             | 220.25                             | 281.48                             | 329.37                                   |  |  |  |  |  |
| 47        | 96.14  | 215.26              | 207.29                                   | 164.63                             | 223.55                             | 286.26                             | 334.94                                   |  |  |  |  |  |
| 48        | 97.96  | 220.87              | 213.82                                   | 167.55                             | 226.92                             | 291.14                             | 340.60                                   |  |  |  |  |  |
| 49        | 99.83  | 226.60              | 220.58                                   | 170.52                             | 230.31                             | 296.10                             | 346.36                                   |  |  |  |  |  |
| 50        | 101.73 | 232.48              | 227.54                                   | 173.56                             | 233.79                             | 301.14                             | 352.22                                   |  |  |  |  |  |
| 51        | 109.57 | 250.38              | 246.56                                   | 186.80                             | 250.85                             | 320.93                             | 374.50                                   |  |  |  |  |  |
| 52        | 118.01 | 269.65              | 267.17                                   | 201.05                             | 269.15                             | 342.04                             | 398.17                                   |  |  |  |  |  |
| 53        | 127.10 | 290.41              | 289.51                                   | 216.40                             | 288.79                             | 364.55                             | 423.35                                   |  |  |  |  |  |
| 54        | 136.88 | 312.78              | 313.71                                   | 232.90                             | 309.88                             | 388.53                             | 450.13                                   |  |  |  |  |  |
| 55        | 147.42 | 336.85              | 339.94                                   | 250.68                             | 332.51                             | 414.08                             | 478.59                                   |  |  |  |  |  |
| 56        | 158.77 | 362.79              | 368.36                                   | 269.80                             | 356.77                             | 441.33                             | 508.85                                   |  |  |  |  |  |
| 57        | 171.01 | 390.72              | 399.15                                   | 290.40                             | 382.80                             | 470.36                             | 541.03                                   |  |  |  |  |  |
| 58        | 184.17 | 420.79              | 432.54                                   | 312.56                             | 410.74                             | 501.29                             | 575.25                                   |  |  |  |  |  |
| 59        | 198.35 | 453.19              | 468.69                                   | 336.41                             | 440.71                             | 534.25                             | 611.61                                   |  |  |  |  |  |
| 60        | 213.64 | 488.09              | 507.88                                   | 362.08                             | 472.88                             | 569.41                             | 650.30                                   |  |  |  |  |  |

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| ADJUSTMENT FACTORS – LIFETIME MAXIMUM (BENEFIT PERIOD) |      |  |  |  |  |
|--|------|--|--|--|--|
| Benefit Period   |      |  |  |  |  |
| 2 Year   | 0.73 |  |  |  |  |
| 3 Year   | 0.86 |  |  |  |  |
| 4 Year   | 0.94 |  |  |  |  |
| 5 Year   | 1.00 |  |  |  |  |
| 6 Year   | 1.04 |  |  |  |  |
| 10 Year  | 1.34 |  |  |  |  |
| Unlimited  | 1.47 |  |  |  |  |

| ADJUSTMENT FACTORS –<br>ELIMINATION PERIOD |      |  |  |  |  |
|--|------|--|--|--|--|
| Elimination Period                         |      |  |  |  |  |
| 30 Day                                     | 1.25 |  |  |  |  |
| 60 Day                                     | 1.08 |  |  |  |  |
| 90 Day                                     | 1.00 |  |  |  |  |
| 120 Day                                    | 0.97 |  |  |  |  |
| 180 Day                                    | 0.90 |  |  |  |  |
| 365 Day                                    | 0.75 |  |  |  |  |

| ADJUSTMENT FACTORS – HOME<br>CARE DAILY BENEFIT |      |  |  |  |  |
|---|------|--|--|--|--|
| Home Care Benefit                               |      |  |  |  |  |
| as a % of Facility                              |      |  |  |  |  |
| Benefit   |      |  |  |  |  |
| 50%   | 0.93 |  |  |  |  |
| 75%   | 0.97 |  |  |  |  |
| 100%  | 1.00 |  |  |  |  |
| 150%  | 1.12 |  |  |  |  |

|  | ADJUST | ADJUSTMENT FACTORS – MONTHLY BENEFIT RIDER INFLATION OPTION   |       |       |       |  |  |  |  |
|--|--------|---|-------|-------|-------|--|--|--|--|
| Home Care Benefit<br>as a % of Facility<br>Benefit | None   | None GPO Simple, 2, 3 & 4% Compound (No Maximum) 5% Compound (No Maximum) (No Maximum) (No Maximum) |       |       |       |  |  |  |  |
| 50%  | 1.065  | 1.065   | 1.075 | 1.090 | 1.090 |  |  |  |  |
| 75%  | 1.063  | 1.063   | 1.068 | 1.083 | 1.083 |  |  |  |  |
| 100%   | 1.050  | 1.050   | 1.055 | 1.070 | 1.070 |  |  |  |  |
| 150%   | 1.047  | 1.047   | 1.052 | 1.067 | 1.067 |  |  |  |  |

|  |                | ADJUSTMENT       | FACTORS – CASH | BENEFIT RIDER                                    |                          |                              |  |  |  |
|--|----------------|------------------|----------------|--|--------------------------|------------------------------|--|--|--|
|  |                | INFLATION OPTION |                |  |                          |                              |  |  |  |
| Home Care Benefit<br>as a % of Facility<br>Benefit | Benefit Period | None             | GPO            | Simple,<br>2, 3 & 4%<br>Compound<br>(No Maximum) | 5% Compound (2x Maximum) | 5 % Compound<br>(No Maximum) |  |  |  |
|  | 2              | 1.43             | 1.43           | 1.48   | 1.50                     | 1.52                         |  |  |  |
|  | 3              | 1.46             | 1.46           | 1.50   | 1.53                     | 1.55                         |  |  |  |
| 50%  | 4              | 1.48             | 1.48           | 1.52   | 1.55                     | 1.57                         |  |  |  |
| Ī  | 5              | 1.50             | 1.50           | 1.54   | 1.57                     | 1.58                         |  |  |  |
|  | 6              | 1.52             | 1.52           | 1.57   | 1.59                     | 1.61                         |  |  |  |
| Ī  | 10             | 1.56             | 1.56           | 1.60   | 1.63                     | 1.65                         |  |  |  |
|  | 2              | 1.52             | 1.52           | 1.57   | 1.60                     | 1.62                         |  |  |  |
| Ī  | 3              | 1.55             | 1.55           | 1.60   | 1.63                     | 1.65                         |  |  |  |
| 75%  | 4              | 1.57             | 1.57           | 1.62   | 1.65                     | 1.66                         |  |  |  |
| ľ  | 5              | 1.59             | 1.59           | 1.64   | 1.66                     | 1.68                         |  |  |  |
| ř  | 6              | 1.62             | 1.62           | 1.66   | 1.69                     | 1.71                         |  |  |  |
| ř  | 10             | 1.65             | 1.65           | 1.70   | 1.73                     | 1.75                         |  |  |  |
|  | 2              | 1.63             | 1.63           | 1.68   | 1.71                     | 1.73                         |  |  |  |
| ţ  | 3              | 1.66             | 1.66           | 1.71   | 1.74                     | 1.76                         |  |  |  |
| 100%   | 4              | 1.68             | 1.68           | 1.73   | 1.76                     | 1.78                         |  |  |  |
| ţ  | 5              | 1.70             | 1.70           | 1.75   | 1.78                     | 1.80                         |  |  |  |
| ţ  | 6              | 1.73             | 1.73           | 1.78   | 1.81                     | 1.83                         |  |  |  |
| ļ*   | 10             | 1.77             | 1.77           | 1.82   | 1.85                     | 1.87                         |  |  |  |

#### Appendix D

#### The Prudential Insurance Company of America Individual Long Term Care Insurance Plan Base Rates and Adjustment Factors

GRP 113172, GRP113172 ED 05/2009, GRP113570 and GRP 113570 ED 05/2009 - For Applications Received Prior to 4/5/2011 Page 6 of 7

|  | A              | DJUSTNIENT FACT  | DJUSTMENT FACTORS – FLEXIBLE CASH BENEFIT RIDER  INELATION OPTION |   |                          |                              |  |  |  |  |  |
|--|----------------|------------------|---|---|--------------------------|------------------------------|--|--|--|--|--|
|  | -              | INFLATION OPTION |   |   |                          |                              |  |  |  |  |  |
| Home Care Benefit<br>as a % of Facility<br>Benefit | Benefit Period | None             | GPO   | Simple, 2,<br>3 & 4% Compound<br>(No Maximum) | 5% Compound (2x Maximum) | 5 % Compound<br>(No Maximum) |  |  |  |  |  |
|  | 2              | 1.215            | 1.215   | 1.240   | 1.250                    | 1.260                        |  |  |  |  |  |
| Ī  | 3              | 1.230            | 1.230   | 1.250   | 1.265                    | 1.275                        |  |  |  |  |  |
| 50%  | 4              | 1.240            | 1.240   | 1.260   | 1.275                    | 1.285                        |  |  |  |  |  |
|  | 5              | 1.250            | 1.250   | 1.270   | 1.285                    | 1.290                        |  |  |  |  |  |
|  | 6              | 1.260            | 1.260   | 1.285   | 1.295                    | 1.305                        |  |  |  |  |  |
|  | 10             | 1.280            | 1.280   | 1.300   | 1.315                    | 1.325                        |  |  |  |  |  |
|  | 2              | 1.260            | 1.260   | 1.285   | 1.300                    | 1.310                        |  |  |  |  |  |
|  | 3              | 1.275            | 1.275   | 1.300   | 1.315                    | 1.325                        |  |  |  |  |  |
| 75%  | 4              | 1.285            | 1.285   | 1.310   | 1.325                    | 1.330                        |  |  |  |  |  |
|  | 5              | 1.295            | 1.295   | 1.320   | 1.330                    | 1.340                        |  |  |  |  |  |
|  | 6              | 1.310            | 1.310   | 1.330   | 1.345                    | 1.355                        |  |  |  |  |  |
|  | 10             | 1.325            | 1.325   | 1.350   | 1.365                    | 1.375                        |  |  |  |  |  |
|  | 2              | 1.315            | 1.315   | 1.340   | 1.355                    | 1.365                        |  |  |  |  |  |
| Ī  | 3              | 1.330            | 1.330   | 1.355   | 1.370                    | 1.380                        |  |  |  |  |  |
| 100%   | 4              | 1.340            | 1.340   | 1.365   | 1.380                    | 1.390                        |  |  |  |  |  |
| Ī  | 5              | 1.350            | 1.350   | 1.375   | 1.390                    | 1.400                        |  |  |  |  |  |
| F  | 6              | 1.365            | 1.365   | 1.390   | 1.405                    | 1.415                        |  |  |  |  |  |
| F  | 10             | 1.385            | 1.385   | 1.410   | 1.425                    | 1.435                        |  |  |  |  |  |

| ADJUSTMENT FACTORS                              |          |  |  |  |
|---|----------|--|--|--|
| SHORTENED BENEFIT PERIOD<br>NONFORFEITURE RIDER |          |  |  |  |
| Included  | Included |  |  |  |
| Yes   | 1.11     |  |  |  |
| No 1.00   |          |  |  |  |

| ADJUSTMENT FACTORS – JOINT<br>WAIVER OF PREMIUM RIDER |      |  |  |  |
|---|------|--|--|--|
| Issue Age   |      |  |  |  |
| 18-54   | 1.01 |  |  |  |
| 55-64   | 1.02 |  |  |  |
| 65-69   | 1.03 |  |  |  |
| 70-74   | 1.05 |  |  |  |
| <b>75-79</b> 1.09                                     |      |  |  |  |

| ADJUSTMENT FACTORS – RETURN<br>OF PREMIUM UPON DEATH RIDER |           |  |  |  |  |  |
|--|-----------|--|--|--|--|--|
| Issue Age  | Issue Age |  |  |  |  |  |
|  |           |  |  |  |  |  |
|  |           |  |  |  |  |  |
| 18-34  | 1.25      |  |  |  |  |  |
| 35-44  | 1.30      |  |  |  |  |  |
| 45-54  | 1.45      |  |  |  |  |  |
| 55-59  | 1.65      |  |  |  |  |  |
| 60-64  | 1.85      |  |  |  |  |  |
| 65-69  | 2.00      |  |  |  |  |  |
| 70-75  | 2.50      |  |  |  |  |  |
| 76-79  | N/A       |  |  |  |  |  |

| ADJUSTMENT FACTORS –<br>UNDERWRITING CLASS |      |  |  |  |
|--|------|--|--|--|
| Underwriting Class                         |      |  |  |  |
| Preferred                                  | 0.85 |  |  |  |
| Standard I                                 | 1.00 |  |  |  |
| Standard II                                | 1.25 |  |  |  |
| Standard III                               | 1.50 |  |  |  |

| ADJUSTMENT FACTORS – SHARED<br>CARE |      |  |
|-------------------------------------|------|--|
| Benefit Period                      |      |  |
| 2 Year                              | 1.23 |  |
| 3 Year                              | 1.15 |  |
| 4 Year                              | 1.10 |  |
| 5 Year                              | 1.08 |  |
| 6 Year                              | 1.08 |  |
| 10 Year                             | 1.07 |  |

| ADJUSTMENT FACTORS – PREMIUM<br>PAYMENT MODE |       |  |  |
|--|-------|--|--|
| Premium Payment                              |       |  |  |
| Mode<br>Annual                               | 1.000 |  |  |
| Semi-Annual                                  | 0.515 |  |  |
| Quarterly                                    | 0.265 |  |  |
| Monthly                                      | 0.090 |  |  |
| Auto-Monthly                                 | 0.085 |  |  |

#### Appendix D

#### The Prudential Insurance Company of America Individual Long Term Care Insurance Plan Base Rates and Adjustment Factors

## GRP 113172, GRP113172 ED 05/2009, GRP113570 and GRP 113570 ED 05/2009 - For Applications Received Prior to 4/5/2011 Page 7 of 7

| ADJUSTMENT FACTORS - DISCOUNTS |                                      |   |   |                                   |                                 |                                  |                                    |
|--------------------------------|--------------------------------------|---|---|-----------------------------------|---------------------------------|----------------------------------|------------------------------------|
|                                | Partner Discount in Combination with |   |   |                                   |                                 |                                  |                                    |
| Partner Status                 |                                      | Employer<br>Sponsored<br>Program Discount | Employer<br>Sponsored<br>Program Discount<br>II | Affiliation Program<br>Discount I | Affiliation Program Discount II | Affiliation Program Discount III | Affiliation Program<br>Discount IV |
| Single Partner                 | 0.85                                 | 0.80                                      | 0.75  | 0.80                              | 0.77                            | 0.75                             | 0.73                               |
| Joint Partner                  | 0.70                                 | 0.65                                      | 0.60  | 0.65                              | 0.62                            | 0.60                             | 0.58                               |
| Single (No Partner)            | 1.00                                 | 0.95                                      | 0.90  | 0.95                              | 0.92                            | 0.90                             | 0.88                               |

| ADJUSTMENT FACTORS SURVIVOR WAIVER OF PREMIUM RIDER |                     |              |  |  |
|---|---------------------|--------------|--|--|
|   | INFLATION OPTION    |              |  |  |
| Issue Ages  | Automatic Inflation | No Inflation |  |  |
| 18-34   | 1.121               | 1.08         |  |  |
| 35-44   | 1.136               | 1.11         |  |  |
| 45-54   | 1.146               | 1.13         |  |  |
| 55-64   | 1.141               | 1.13         |  |  |
| 65-74   | 1.107               | 1.10         |  |  |
| 75-79   | 1.075               | 1.07         |  |  |

| ADJUSTMENT FACTORS – WAIVER<br>OF THE ELIMINATION PERIOD FOR<br>HOME CARE |      |  |  |
|---|------|--|--|
| Elimination Period  |      |  |  |
| 30 Day  | 1.04 |  |  |
| 60 Day  | 1.10 |  |  |
| 90 Day  | 1.12 |  |  |
| 120 Day   | NA   |  |  |
| 180 Day   | NA   |  |  |
| 365 Day   | NA   |  |  |

| ADJUSTMENT FACTORS – |  |  |  |  |
|----------------------|--|--|--|--|
| ELIMINATION OF CASH  |  |  |  |  |
| ALTERNATIVE OPTION   |  |  |  |  |
| Taken 0.87           |  |  |  |  |
| Not Taken 1.00       |  |  |  |  |

Elimination of Cash Alternative not available to policies with Cash or Flex Cash Riders

SERFF Tracking #: PRUD-131555379 State Tracking #: PRUD-131555379 Company Tracking #: IIGHILTC3RATE-RP-PA

State: Pennsylvania Filing Company: The Prudential Insurance Company of America

TOI/Sub-TOI: LTC03I Individual Long Term Care/LTC03I.001 Qualified

Product Name: Individual Long Term Care Insurance

Project Name/Number: ILTC-3 Re-rate /7I-2018

#### **Supporting Document Schedules**

| Satisfied - Item: | Transmittal Letter (A&H)   |
|-------------------|--|
| Comments:         |  |
| Attachment(s):    | PA - Filing Cover Letter (ILTC-3) - 6-25-2018.pdf                                  |
| Item Status:      |  |
| Status Date:      |  |
| Bypassed - Item:  | Actuarial Certification (A&H)  |
|                   |  |
| Bypass Reason:    | Please refer to section 24, pages 8 and 9 of the Actuarial Memorandum.             |
| Attachment(s):    |  |
| Item Status:      |  |
| Status Date:      |  |
| Satisfied - Item: | Actuarial Memorandum and Explanatory Information (A&H)                             |
| Comments:         | · · · · ·  |
| Attachment(s):    | Act Memo - Revised Rates ILTC3 - PA (Public Version).pdf PA Appendices - ILTC3.pdf |
| Item Status:      |  |
| Status Date:      |  |
| 5                 | A 1  |
| Bypassed - Item:  | Advertisements (A&H)   |
| Bypass Reason:    | N/A  |
| Attachment(s):    |  |
| Item Status:      |  |
| Status Date:      |  |
| Bypassed - Item:  | Authorization to File (A&H)  |
|                   |  |
| Bypass Reason:    | N/A  |
| Attachment(s):    |  |
| Item Status:      |  |
| Status Date:      |  |
| Bypassed - Item:  | Insert Page Explanation (A&H)  |
| Bypass Reason:    | N/A  |
| Attachment(s):    |  |
| Item Status:      |  |
|                   |  |

| State:               | Pennsylvania         |                                     | Filing Company:             | The Prudential Insurance Company of America |
|----------------------|----------------------|-------------------------------------|-----------------------------|---|
| TOI/Sub-TOI:         |                      | Long Term Care/LTC03I.001 Qualified |                             |   |
| Product Name:        | Individual Long Ter  |                                     |                             |   |
| Project Name/Number: | ILTC-3 Re-rate /7I-2 | 2018                                |                             |   |
| Status Date:         |                      |                                     |                             |   |
| Bypassed - Item:     | Rat                  | te Table (A&H)                      |                             |   |
| Bypass Reason:       | N/A                  |                                     |                             |   |
| Attachment(s):       |                      |                                     |                             |   |
| Item Status:         |                      |                                     |                             |   |
| Status Date:         |                      |                                     |                             |   |
| Bypassed - Item:     | Rer                  | placement Form with Highlighted     | I Changes (A&H)             |   |
| Bypass Reason:       | N/A                  |                                     | r Orlanges (riai i)         |   |
| Attachment(s):       |                      |                                     |                             |   |
| Item Status:         |                      |                                     |                             |   |
| Status Date:         |                      |                                     |                             |   |
| Bypassed - Item:     | Ras                  | serve Calculation (A&H)             |                             |   |
| Bypass Reason:       |                      | ase refer to Actuarial Memorando    | um and corresponding append | lines                                       |
| Attachment(s):       | 1 101                | ase refer to Notaanai Memorana      | and corresponding append    |   |
| Item Status:         |                      |                                     |                             |   |
| Status Date:         |                      |                                     |                             |   |
| Bypassed - Item:     | Var                  | riability Explanation (A&H)         |                             |   |
| Bypass Reason:       | N/A                  |                                     |                             |   |
| Attachment(s):       | 19/7                 | 1                                   |                             |   |
| Item Status:         |                      |                                     |                             |   |
| Status Date:         |                      |                                     |                             |   |
|                      |                      |                                     |                             |   |
| Satisfied - Item:    | App                  | pendix E - DOB - ILTC-3             |                             |   |
| Comments:            |                      |                                     |                             |   |
| Attachment(s):       | App                  | pendix E - DOB - ILTC3.pdf          |                             |   |
| Item Status:         |                      |                                     |                             |   |
| Status Date:         |                      |                                     |                             |   |

Company Tracking #:

IIGHILTC3RATE-RP-PA

SERFF Tracking #:

PRUD-131555379

State Tracking #:

PRUD-131555379



Keith Burns, ASA, MAAA

Vice President and Actuary Financial Management

The Prudential Insurance Company of America Long Term Care Unit 100 Mulberry Street Gateway Center 2, 11<sup>th</sup> Floor Newark, NJ 07102 Tel 402 715-4861 keith.burns@prudential.com

June 25, 2018

The Honorable Jessica Altman Commissioner of Insurance Pennsylvania Insurance Department 1326 Strawberry Square Harrisburg, PA 17120

Re.: The Prudential Insurance Company of America

NAIC #304-68241

Individual Long Term Care Insurance

Form Numbers: GRP 113172, et al, GRP 113172 ED 05/2009 et al, GRP 113570, et al

and GRP 113570 ED 05/2009, et al (Policies sold prior to 4/5/2011)

#### Dear Commissioner Altman:

We enclose for your review a long-term care insurance rate schedule change. We are requesting the approval of a premium rate increase for the above referenced forms.

Form GRP 113172 was previously approved by the Department on June 16, 2005 – Dept ID #A84013001. Form GRP 113172 ED 05/2009 was approved by the Department on September 22, 2009 – SERFF # PRUD-12565471. Form GRP 113570 was previously approved by the Department on February 9, 2006 Dept ID #A916998001. Form number GRP 113570 ED 05/2009 was previously approved by the Department on September 25, 2009 – SERFF #PRUD-125656020. The policy series of forms GRP 113172, GRP 113172 ED 05/2009, GRP 113570 and GRP 113570 ED 05/2009 were sold nationwide during the period of 2005 through 2012. These products are no longer being marketed in any state. Please be advised that this rate increase does not apply to policies whose applications were received on or after April 5, 2011.

A previous rate schedule change under this series of forms was reviewed and approved by the Department under SERFF tracking number PRUD-130398021 on May 11, 2016.

Some of Prudential's pricing assumptions for this series of forms, although based on the best information then available, were not consistent with our emerging experience. In view of these results, we are requesting a rate increase for policy series GRP 113172, et al, GRP 113172 ED 05/2009 et al, GRP 113570, et al and GRP 113570 ED 05/2009, et al in the state of Pennsylvania. Premiums for policies with an automatic inflation rider of (3% compound, 4% compound, 5% compound, 5% compound to 2X, or 5% simple) would increase by 15.8%, while premiums for policies without automatic inflation would increase by 15%.

The rate increase is needed to help ensure that future premiums, in combination with existing reserves, will be adequate to fund anticipated claims. We will continue to monitor the performance of this block of business after this rate action. We anticipate there will be future rate increase filings.

The Honorable Jessica Altman June 25, 2018 Page Two

For policies issued on or after September 2, 2010, we consider this rate increase filing to satisfy the regulatory requirement to provide an annual filing for the three years following a prior rate increase.

The requested rate increases will not restore original profit margins, but will help Prudential avoid additional losses as well as further depletion of its surplus.

The proposed premium rates will be effective on each policy's first modal premium due date that is on or after the state increase effective date established by Prudential following state approval. The earliest increase, once approval is provided, will be no earlier than 60 days from the date of approval, so that Prudential can provide sixty days advance notice of the rate increase to insureds.

We understand that a premium increase may be difficult for our policyholders to absorb. Consequently, Prudential is prepared to offer a number of options to help mitigate or eliminate the impact of the higher premium an insured is paying such as, reducing their benefit period, decreasing their Daily Benefit Maximum, or dropping rider(s) (e.g. optional coverage). Additionally, as an alternative, the Contingent Non-forfeiture benefit will be made available to all impacted policyholders whose plan design does not include the Non-forfeiture Benefit Rider.

Furthermore, if not already exercised during the first rate increase, policyholders will also be given the opportunity to remove the Cash Alternative Benefit provision from their policy in return for a 13% premium reduction. These policy amendments (GRP 114978) and (GRP 114979) were previously approved by the Department on September 26, 2013, under SERFF Filing Numbers PRUD-129026928 and PRUD-129026885.

The following items are included with this submission:

- All Actuarial Material
- All Required Certifications
- State transmittal and checklists (If applicable)

Given the proprietary nature of the assumptions, Prudential is requesting Appendix C not be allowed for public viewing. In addition, it is Prudential's request to replace the Actuarial Memorandum with the modified public viewing Actuarial Memorandum.

The Honorable Jessica Altman June 25, 2018 Page Two

**Correspondence**: Please correspond directly with my associate concerning this filing.

Raenonna Prince, CLTC, LTCP Lead Analyst The Prudential Insurance Company of America P. O. Box 7907 Philadelphia, PA 19101-7907 Voice: (800) 732-0416 or (215) 658-6281

Fax: (888) 294-6335

e-mail: raenonna.prince@prudential.com

Very truly yours,

Keith Burns, ASA, MAAA Vice President and Actuary

Keith Burns

Enclosures

# June 15, 2018 Actuarial Memorandum Supporting Rate Revision for The Prudential Insurance Company of America Individual Long-Term Care Insurance Plan Pennsylvania

#### 1. Scope and Purpose

The purpose of this memorandum is to provide actuarial information supporting a rate revision to premiums for the following The Prudential Insurance Company of America's Tax-Qualified individual long-term care Forms and their associated riders:

| <u>Product Name</u> | Form Number           | <u>Issue Dates in Pennsylvania</u> |
|---------------------|-----------------------|------------------------------------|
| ILTC3               | GRP 113172            | 09/2005 - 08/2012                  |
| ILTC3 Franchise     | GRP 113570            | 09/2005 - 08/2012                  |
| ILTC3               | GRP 113172 ED 05/2009 | 09/2005 - 08/2012                  |
| ILTC3 Franchise     | GRP 113570 ED 05/2009 | 09/2005 - 08/2012                  |

This state also approved revised new business rates for the above form number that were effective for applications received on or after 2/14/2011. This rate revision does not apply to any policies applied for with this form number in this state after this date.

Some riders may not be available in all states. This rate filing is not intended to be used for other purposes.

Upon approval of this rate revision, Prudential will communicate to policyholders their options to reduce the impact of the rate increase. There will also be opportunities for almost all policyholders to keep the premium at or below the same level they were paying prior to the rate revision. These options will include reducing the lifetime maximum, reducing the daily benefit, eliminating optional riders, electing the removal of the Cash Alternative Benefit Rider, and a contingent non-forfeiture option that we will be offering to all policyholders regardless of their age or rate increase amount.

These revisions are necessary because the 2017 best estimate projections of the nationwide lifetime loss ratios are significantly worse than the expected loss ratios. The higher lifetime loss ratios are due to adverse morbidity and persistency experience. Given additional deterioration to experience, Prudential anticipates the need to file for additional rate increases in the future.

Please refer to Section 22 for a description of the information contained in each Appendix included in the filing.

#### 2. Description of Benefits

The policies issued on these forms are referred as the "ILTC3" product series. This product was individually underwritten and provides comprehensive long-term care coverage for care received in a nursing home, assisted living facility, or hospice in addition to home and community-based care. This product is intended to be a Tax Qualified Long Term Care Insurance Contract as defined by the internal revenue code section 7702B(b).

This product reimburses covered long-term care expenses subject to the amount of coverage purchased. A waiting period, institutional daily benefit amount, home and community care percentage, maximum lifetime benefit amount and inflation protection option are selected at issue. The available choices can be found in the attached premium rate tables.

The benefit eligibility criteria is based on the insured's loss of the ability to perform two of the six activities of daily living (ADLs) or having a severe cognitive impairment. Activities of Daily Living are bathing, continence, dressing, eating, toileting, and transferring. Premiums will be waived beginning the first day of the next month following when LTC benefits are payable.

#### 3. Renewability Clause

This product is a Guaranteed Renewable, Individual Long Term Care policy.

#### 4. Marketing Method

This plan was marketed to individuals by licensed agents.

#### 5. Applicability

The revised rates contained in this memorandum will be applicable to in-force policies, as these policy forms are no longer sold in the market, and all future periodic inflation protection offers. The revised premium rate schedules can be found in Appendix D.

#### 6. Actuarial Assumptions

This section contains proprietary information that was redacted prior to being made publicly available.

#### 7. Premium Classes

«StateName» Page 2 of 7

The Company used several premium classes based on the underwriting assessment of the potential policyholder at time of issue. These premium classes are shown in the premium rate schedules included in Appendix D.

#### 8. Issue Age Range

This product was available for issue ages up to 79. Premiums are based on issue age.

#### 9. Area Factors

The Company did not use area factors within the state in the premium scale for this product.

#### 10. Average Annual Premium

The average annual premium for this product for both prior to the impact of the requested rate increase, and after, is indicated in Appendix A to this memorandum.

#### 11. Modal Premium Factors

Modal loads are required because of the varied expenses incurred by the Company and the effect of interest and persistency. The modal premium factors will remain unchanged from the current factors.

#### 12. Claim Liability and Reserve

Claim reserves were calculated using appropriate actuarial methods for IBNR and for open claims on a disabled life basis. The claim reserves were discounted to the date of incurral for each claim and have been included in the historical incurred claims. An annual interest rate of 4.0% was used to calculate the present value of future claims in the supporting exhibits.

#### 13. Active Life Reserves

We have provided supporting evidence for the justification of the proposed increase based on the relationship of incurred claims divided by earned premium compared to the minimum required loss ratios. Incurred claims exclude any change in active life reserves.

#### 14. Trend Assumption

«StateName» Page 3 of 7

Benefits payable are equal to or less than the daily or monthly benefit limit. We have not included any medical trend in the projections.

### 15. Requested Rate Increase and Demonstration of Satisfaction of Loss Ratio Requirements

Prudential is requesting an average premium increase of 15.6%. These rate increases vary depending on whether the policyholder has automatic inflation or not. 15% of the requested rate increase is due to additional adverse experience, while the remaining increases are to recover previous rate increase requests that were not fully approved.

| Policy Type         | ILTC3 |
|---------------------|-------|
| Automatic Inflation | 15.8% |
| No Inflation        | 15.0% |
| Average             | 15.6% |

Satisfaction of the loss ratio requirement is demonstrated in Appendix A. The demonstration is based on a 58% loss ratio on the initial premium and an 85% loss ratio on the increased premium. This approach requires that the sum of the historical and projected future incurred claims must exceed the sum of 58% of the initial premium and 85% of the increased premium.

#### 16. Distribution of Business

The historical experience reflects the actual distribution of policies during the experience period. We used the current distribution of business as of June 30, 2017 to project future experience. Appendix E contains the distribution of the inforce policies by key demographic and benefit characteristics.

#### 17. Experience - Past and Future

The historical and projected nationwide and state-specific experience, both with and without the rate increase, is contained in Appendix B and Appendix F.

Historical experience is shown by claim incurral year.

#### 18. Lifetime Loss Ratio

«StateName» Page 4 of 7

The anticipated nationwide lifetime loss ratios, both without a rate increase and with the requested rate increase, are shown in Appendix A. This compares to a target loss ratio of 67.8% that was anticipated at the time of original filing. The development of these nationwide lifetime loss ratios is shown in Appendix B and Appendix F.

The rate increase is assumed effective November 1, 2018 in our projections.

#### 19. History of Rate Adjustments

See Appendix A for a history of rate increases on inforce policyholders with this policy form in this state.

#### 20. Number of Policyholders

The current number of policyholders as of June 30, 2017 can be found in Appendix A.

#### 21. Proposed Effective Date

This rate revision will be implemented following state approval and a minimum of a 60 day notification to the certificate holder. Implementation will be no earlier than November 1, 2018.

#### 22. Summary of Appendices

Appendix A primarily contains information that is specific to the state in which this filing is made. Examples of some items include are the requested rate increase, the average annual premium, demonstration of meeting required minimum loss ratio standards, the number of policyholders inforce, etc.

Appendix B contains historical and projected nationwide experience for all policies issued under this form. The appendix also includes the projected lifetime loss ratios both without and with the proposed increase.

Appendix C contains proprietary information that was redacted prior to being made publicly available.

Appendix D contains the premium rate pages associated with this filing.

«StateName» Page 5 of 7

Appendix E contains the distribution of the inforce policies by key demographic and benefit characteristics.

Appendix F contains the same information as Appendix B except it contains only state specific experience and projections.

#### 23. Relationship of Renewal Premium to New Business Premium.

Prudential is no longer selling any new Long-Term Care business. Therefore, the comparison of renewal premium rates after the rate increase to the Company's current new business premium rate schedule is not applicable.

#### 24. Actuarial Certification

Reith Burs

I am a member of the American Academy of Actuaries. I meet the Academy's qualification standards for rendering this opinion and am familiar with the requirements for filing long term care insurance premiums.

To the best of my knowledge and judgment this rate filing is in compliance with the applicable laws and regulations of this State as they relate to premium rate developments and revisions, with the exception that Prudential is not currently providing a certification that no future increases are anticipated under moderately adverse experience, with the exception that Prudential is not currently providing a certification that no future increases are anticipated under moderately adverse experience.

The policy design and coverages, the underwriting used at the time of issue, and the claim adjudication process were all considered when setting the actuarial assumptions.

In forming my opinion, I have used actuarial assumptions and actuarial methods as I considered necessary. The pricing assumptions are consistent with Prudential's 2017 best estimates and do not include a margin for adverse experience.

The premium rates are not excessive or unfairly discriminatory. Due to additional deterioration in experience, Prudential anticipates the need to file for additional in-force premium increases on these forms in the future.

«StateName» Page 6 of 7

Keith Burns, ASA, MAAA Vice President and Actuary Prudential Long Term Care June 15, 2018

«StateName» Page 2 of 7

## Appendix A The Prudential Insurance Company of America ILTC3

#### Pennsylvania

#### **Requested Rate Increase**

| Benefit Type   | Requested Amount |
|----------------|------------------|
| No Inflation   | 15.0%            |
| Auto Inflation | 15.8%            |

#### 10. Average Annual Premium

| Rate Basis                                  | <b>Pennsylvania</b> | <b>Nationwide</b> |
|---|---------------------|-------------------|
| Without Increase                            | \$2,702             | \$2,850           |
| With Increase                               | \$3,124             | \$3,297           |
| 15. Satisfaction of Loss Ratio Requirements |                     |                   |
| 1) Total Incurred Claims                    |                     | \$2,423,593,774   |
| 58% of initial premium                      |                     | \$1,154,461,723   |
| 85% of increased premium                    |                     | \$583,554,267     |
| 2) Sum of 58%/85% premium                   |                     | \$1,738,015,989   |
| Is 1 greater than 2?                        |                     | Yes               |

#### 18. Lifetime Loss Ratio

| Policy type    | Without Increase | With Increase |
|----------------|------------------|---------------|
| All            | 99%              | 91%           |
| No Inflation   | 78%              | 72%           |
| Auto Inflation | 102%             | 93%           |

#### 19. History of Rate Adjustments

No Inflation Policies:

10% Implemented on 2/1/2014

Auto Inflation Policies:

20% Implemented on 2/1/2014 20% Implemented on 12/1/2016

#### 20. Number of Policyholders and Annualized Premium as of June 30, 2017

|                | <u>Policies</u>     | <u>Inforce</u>    | <u> Premium Inforce</u> |                   |  |
|----------------|---------------------|-------------------|-------------------------|-------------------|--|
| Policy type    | <b>Pennsylvania</b> | <b>Nationwide</b> | <b>Pennsylvania</b>     | <b>Nationwide</b> |  |
| All            | 1,448               | 38,382            | \$3,912,041             | \$109,397,009     |  |
| No Inflation   | 360                 | 6,693             | \$799,389               | \$15,864,290      |  |
| Auto Inflation | 1,088               | 31,689            | \$3,112,652             | \$93,532,719      |  |

Appendix B
The Prudential Insurance Company of America
Historical and Projected Experience
Nationwide Experience
Pennsylvania Premium Rate Basis
ILTC3

Calena Year

2017\*\* 2018 2019

2020 2021 2022

2031 2032

2033

2054 2055

Historical

|     | Historical |             |           |            |            |          |
|-----|------------|-------------|-----------|------------|------------|----------|
| Ca  | lendar     | Earned      | Paid      | Claim      | Incurred   | Incurred |
| 7   | Year       | Premium     | Claims    | Reserve    | Claims     | Ratio    |
| - 2 | 2005       | 640,606     | 0         | 0          | 0          | 0%       |
| 1   | 2006       | 6,903,546   | 7,858     | 0          | 7,858      | 0%       |
| - 2 | 2007       | 16,549,185  | 603,483   | 115,366    | 718,850    | 4%       |
| 1 2 | 2008       | 31,209,263  | 1,503,924 | 238,283    | 1,742,207  | 6%       |
| 1 2 | 2009       | 46,029,828  | 3,386,043 | 524,435    | 3,910,478  | 8%       |
| - 2 | 2010       | 62,050,973  | 3,699,909 | 380,174    | 4,080,083  | 7%       |
| 2   | 2011       | 88,430,437  | 3,011,366 | 845,597    | 3,856,963  | 4%       |
| 1 2 | 2012       | 107,311,165 | 5,754,168 | 1,461,034  | 7,215,202  | 7%       |
| - 2 | 2013       | 105,881,731 | 5,011,820 | 2,222,598  | 7,234,418  | 7%       |
| 2   | 2014       | 113,903,146 | 5,914,707 | 4,168,697  | 10,083,404 | 9%       |
| 1 2 | 2015       | 116,810,106 | 4,732,243 | 9,377,149  | 14,109,392 | 12%      |
| 1 2 | 2016       | 124,419,095 | 2,653,154 | 14,513,912 | 17,167,066 | 14%      |
| 2   | 017*       | 63,363,203  | 120,159   | 12,105,385 | 12,225,545 | 19%      |

**Projection without Rate Increase** 

Projection with Rate Increase Earned Premium Incurre Claim

63318.115
125.008.239
131.285.705
128.489.613
122.550.346
116.891.308
110.250.540
110.250.540
110.250.540
110.250.540
110.308.8432
100.145.659
93.616.523
92.995.975
89.316.538
88.1750.322
77.874.130
73.888.543
69.822.062
65.675.924
61.482.950
73.7874.213
68.26.808
33.107.103
29.579.810
40.712.812
26.826.808
33.107.103
29.579.810
26.264.920
23.175.375
25.371
17.285.731
17.705.025
15.331.022
13.194.830
11.288.533
11.288.533
11.288.533

8,120,331 6,831,482 32,692,891

Claims 10,428,036 23,621,385 27,064,217 31,376,347 36,256,716 41,662,962 47,707,080 54,431,257 69,825,911 78,502,025 87,882,141 97,959,523 108,612,811

119,689,407 131,088,617

142,682,993 154,248,929 154,248,929 155,333,648 175,546,384 175,546,384 175,546,384 194,667,727 203,006,600 209,533,884 214,994,198 214,994,198 214,994,198 211,637,024 112,637,024 1197,999,494 189,016,091 178,871,774 167,764,772 155,942,027 143,595,283 131,051,232

118,661,934 106,589,527 805,535,804

Incurrec Ratio

1461% 1560%

2464%

9% 142% 91%

| 110]     |             |             |          |
|----------|-------------|-------------|----------|
| Calendar | Earned      | Incurred    | Incurred |
| Year     | Premium     | Claims      | Ratio    |
| 2017**   | 63,318,115  | 10,428,036  | 16%      |
| 2018     | 123,682,640 | 23,689,026  | 19%      |
| 2019     | 119,893,802 | 27,823,236  | 23%      |
| 2020     | 115,922,854 | 32,411,345  | 28%      |
| 2021     | 110,564,624 | 37,473,962  | 34%      |
| 2022     | 105,458,836 | 43,083,827  | 41%      |
| 2023     | 102,393,506 | 49,355,417  | 48%      |
| 2024     | 99,464,072  | 56,335,089  | 57%      |
| 2025     | 96,478,609  | 63,998,498  | 66%      |
| 2026     | 93,450,148  | 72,324,441  | 77%      |
| 2027     | 90,342,542  | 81,341,075  | 90%      |
| 2028     | 87,157,131  | 91,093,057  | 105%     |
| 2029     | 83,889,372  | 101,573,606 | 121%     |
| 2030     | 80,568,601  | 112,657,350 | 140%     |
| 2031     | 77,174,174  | 124,186,623 | 161%     |
| 2032     | 73,740,492  | 136,056,702 | 185%     |
| 2033     | 70,242,694  | 148,135,053 | 211%     |
| 2034     | 66,646,388  | 160,188,927 | 240%     |
| 2035     | 62,977,287  | 171,747,688 | 273%     |
| 2036     | 59,236,512  | 182,404,888 | 308%     |
| 2037     | 55,453,659  | 192,324,171 | 347%     |
| 2038     | 51,667,192  | 202,373,441 | 392%     |
| 2039     | 47,867,164  | 211,090,819 | 441%     |
| 2040     | 44,079,891  | 217,925,773 | 494%     |
| 2041     | 40,351,378  | 222,596,215 | 552%     |
| 2042     | 36,717,342  | 225,128,650 | 613%     |
| 2043     | 33,212,227  | 225,496,657 | 679%     |
| 2044     | 29,857,208  | 223,779,054 | 749%     |
| 2045     | 26,675,819  | 219,932,208 | 824%     |
| 2046     | 23,686,076  | 213,996,228 | 903%     |
| 2047     | 20,899,639  | 206,186,968 | 987%     |
| 2048     | 18,324,735  | 196,859,505 | 1074%    |
| 2049     | 15,966,122  | 186,318,561 | 1167%    |
| 2050     | 13,825,153  | 174,770,573 | 1264%    |
| 2051     | 11,898,701  | 162,472,981 | 1365%    |
| 2052     | 10,179,565  | 149,625,498 | 1470%    |
| 2053     | 8,658,012   | 136,568,683 | 1577%    |
| 2054     | 7,322,508   | 123,669,606 | 1689%    |
| 2055     | 6,160,257   | 111,097,609 | 1803%    |
| 2056+    | 29,480,526  | 839,990,211 | 2849%    |

| * Historical 2017 Experience - | 1/1/2017 through 6/30/2017     |
|--------------------------------|--------------------------------|
| 88 Decision of 2017 Francisco  | 7/1/2017 Abress - L 12/21/2017 |

| Loss | Ratio | Summaries |  |
|------|-------|-----------|--|

1,039,391,086 93,201,609 1,495,227,500 2,420,368,489 2,534,618,586 2,513,570,098 1,039,391,086 1,637,594,592 2,676,985,677 Accumulated Value of Historical to 6/30/2017 93,201,609 9% 162% 99% Present Value of Future to 6/30/2017 Total Values 2,330,392,166 2,423,593,774 (Discounted at 4.0%)

Projected Loss Ratio Overall No Inflation Auto Inflation With Increase 91% 72% 93%

Minimum Lifetime Loss Ratio

Appendix B
The Prudential Insurance Company of America
Historical and Projected Experience
Pennsylvania Experience
Pennsylvania Premium Rate Basis
ILTC3

Calenda Year

2017\*\* 2018 2019

| H | is | toı |
|---|----|-----|
|---|----|-----|

| Historical |          |           |         |         |          |          |
|------------|----------|-----------|---------|---------|----------|----------|
|            | Calendar | Earned    | Paid    | Claim   | Incurred | Incurred |
|            | Year     | Premium   | Claims  | Reserve | Claims   | Ratio    |
|            | 2005     | 12,956    | 0       | 0       | 0        | 0%       |
|            | 2006     | 468,713   | 0       | 0       | 0        | 0%       |
|            | 2007     | 1,124,764 | 0       | 0       | 0        | 0%       |
|            | 2008     | 1,673,501 | 0       | 0       | 0        | 0%       |
|            | 2009     | 2,135,409 | 0       | 0       | 0        | 0%       |
|            | 2010     | 2,802,214 | 320,221 | 4,011   | 324,232  | 12%      |
|            | 2011     | 3,531,923 | 115,143 | 4,931   | 120,074  | 3%       |
|            | 2012     | 3,611,796 | 258,881 | 57,031  | 315,912  | 9%       |
|            | 2013     | 3,470,996 | 116,202 | 43,556  | 159,758  | 5%       |
|            | 2014     | 3,613,284 | 338,049 | 116,117 | 454,166  | 13%      |
|            | 2015     | 3,632,299 | 213,975 | 501,740 | 715,715  | 20%      |
|            | 2016     | 3,632,726 | 46,681  | 206,754 | 253,435  | 7%       |
|            | 2017*    | 1,944,521 | 4,452   | 357,284 | 361,736  | 19%      |

**Projection without Rate Increase** 

| Projection | with | Rate | Increase |
|------------|------|------|----------|

1.898.260
3.767.739
3.982.861
3.931.893
3.830.268
3.723.995
3.612.176
3.590.194
3.268.011
3.268.011
3.268.013
2.779.173
2.252.1779
2.254.353
2.177.92
2.389.355
2.178.768
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2.117.265
2.117.265
2.117.265
2.117.265
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Incurre Claim

392,572 881,342 998,120 1.144,547 1.309,136 1.491,873 1.693,949 1.915,040 2.152,854 2.407,836 2.2680,329 2.971,720 3.228,187 3.598,722 3.924,020 4.573,751 4.573,751 4.573,751 5.577,643 5

Incurrec Ratio

21%
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|          | Cuon without        |            |          |
|----------|---------------------|------------|----------|
| Calendar | Earned              | Incurred   | Incurred |
| Year     | Premium             | Claims     | Ratio    |
| 2017**   | 1,898,260           | 392,572    | 21%      |
| 2018     | 3,728,003           | 883,916    | 24%      |
| 2019     | 3,638,971           | 1,026,585  | 28%      |
| 2020     | 3,549,157           | 1,182,851  | 33%      |
| 2021     | 3,457,333           | 1,353,556  | 39%      |
| 2022     | 3,361,317           | 1,543,161  | 46%      |
| 2023     | 3,260,300           | 1,752,920  | 54%      |
| 2024     | 3,159,135           | 1,982,510  | 63%      |
| 2025     | 3,056,085           | 2,229,574  | 73%      |
| 2026     | 2,949,397           | 2,494,582  | 85%      |
| 2027     | 2,842,247           | 2,777,884  | 98%      |
| 2028     | 2,732,942           | 3,080,933  | 113%     |
| 2029     | 2,621,445           | 3,401,840  | 130%     |
| 2030     | 2,507,892           | 3,733,353  | 149%     |
| 2031     | 2,392,532           | 4,072,036  | 170%     |
| 2032     | 2,275,473           | 4,413,134  | 194%     |
| 2033     | 2,155,912           | 4,748,880  | 220%     |
| 2034     | 2.034.035           | 5,063,729  | 249%     |
| 2035     | 1,910,284           | 5,343,644  | 280%     |
| 2036     | 1,785,271           | 5,589,390  | 313%     |
| 2037     | 1,659,841           | 5,796,588  | 349%     |
| 2038     | 1,534,626           | 5,987,746  | 390%     |
| 2039     | 1,410,046           | 6,115,164  | 434%     |
| 2040     | 1,287,261           | 6,171,544  | 479%     |
| 2041     | 1.167.486           | 6.164.677  | 528%     |
| 2042     | 1.051.986           | 6,086,743  | 579%     |
| 2043     | 941,711             | 5,942,377  | 631%     |
| 2044     | 837,441             | 5,743,738  | 686%     |
| 2045     | 739,761             | 5,493,834  | 743%     |
| 2046     | 649,058             | 5,209,119  | 803%     |
| 2047     | 565,666             | 4,895,768  | 865%     |
| 2048     | 489,847             | 4,567,243  | 932%     |
| 2049     | 421,598             | 4.231.286  | 1004%    |
| 2050     | 360,724             | 3,891,102  | 1079%    |
| 2051     | 306,902             | 3,557,439  | 1159%    |
| 2052     | 259,741             | 3,236,447  | 1246%    |
| 2053     | 218,793             | 2,931,452  | 1340%    |
| 2054     | 183,511             | 2,641,340  | 1439%    |
| 2055     | 153,306             | 2,364,182  | 1542%    |
| 2056+    | 723,824             | 19,151,670 | 2646%    |
|          | yperience - 1/1/201 |            |          |

| * Historical 2017 Experience - | 1/1/2017 through 6/30/2017    |
|--------------------------------|-------------------------------|
| ## Designed 2017 Ferranian     | 7/1/2017 Abanasa b 12/21/2017 |

#### Loss Ratio Summaries

| Loss Ratio Sullillaries                      |            |            |      |            |            |      |
|--|------------|------------|------|------------|------------|------|
| Accumulated Value of Historical to 6/30/2017 | 38,057,872 | 3,063,713  | 8%   | 38,057,872 | 3,063,713  | 8%   |
| Present Value of Future to 6/30/2017         | 45,887,357 | 70,093,978 | 153% | 50,250,237 | 67,524,435 | 134% |
| Total Values                                 | 83,945,229 | 73,157,691 | 87%  | 88,308,109 | 70,588,147 | 80%  |
| (Discounted at 4.0%)                         |            |            |      |            |            |      |

| Projected Loss Ratio | Without Increase | With Increase |
|----------------------|------------------|---------------|
| Overall              | 87%              | 80%           |
| No Inflation         | 69%              | 64%           |
| Auto Inflation       | 92%              | 84%           |

## Appendix E The Prudential Insurance Company of America Distribution of Inforce Business as of June 30, 2017 ILTC3

| Count  | % of Count  | Premium   | % of Premium |
|--------|---|---|--------------|
|        |   |   |              |
| 876    | 2.3%  | 2,129,395   | 1.9%         |
| 2,883  | 7.5%  | 7,285,320   | 6.7%         |
| 3,727  | 9.7%  | 10,210,173  | 9.3%         |
| 5,284  | 13.8%   | 15,222,663  | 13.9%        |
| 5,124  | 13.4%   | 14,962,771  | 13.7%        |
| 7,202  | 18.8%   | 21,327,951  | 19.5%        |
| 10,568 | 27.5%   | 30,849,558  | 28.2%        |
| 2,718  | 7.1%  | 7,409,178   | 6.8%         |
| 38,382 | 100.0%  | 109,397,009   | 100.0%       |
|        |   |   |              |
| 196    | 0.5%  | 221.084   | 0.2%         |
|        |   | •   | 0.3%         |
|        |   | •   | 0.8%         |
|        |   | •   | 2.4%         |
| •      |   |   | 6.9%         |
|        |   |   | 15.7%        |
| ·      |   |   | 25.3%        |
| ·      |   |   | 26.9%        |
| •      |   |   | 15.5%        |
| ,      |   |   | 4.7%         |
|        |   |   | 1.3%         |
|        |   |   | 0.0%         |
| 38,382 | 100.0%  | 109,397,009   | 100.0%       |
| 58.7   |   |   |              |
|        |   |   |              |
| 32     | 0.1%  | 33.217  | 0.0%         |
|        |   |   | 0.1%         |
|        |   | ,   | 0.2%         |
|        |   | •   | 0.6%         |
| 887    |   | •   | 1.6%         |
|        |   |   | 4.7%         |
| ·      | 13.8%   |   | 11.8%        |
|        |   |   | 20.8%        |
| ·      |   |   | 28.0%        |
| ·      | 17.5%   |   | 20.3%        |
| •      |   |   | 8.9%         |
| ·      |   |   | 3.0%         |
| 38,382 | 100.0%  | 109,397,009   | 100.0%       |
|        | 876 2,883 3,727 5,284 5,124 7,202 10,568 2,718 38,382  196 257 553 1,196 3,238 6,938 10,358 9,723 4,595 1,091 237 - 38,382  58.7  32 107 194 429 887 2,166 5,287 8,737 10,678 6,730 2,460 675 | 876 2.3% 2,883 7.5% 3,727 9.7% 5,284 13.8% 5,124 13.4% 7,202 18.8% 10,568 27.5% 2,718 7.1% 38,382 100.0%  196 0.5% 257 0.7% 553 1.4% 1,196 3.1% 3,238 8.4% 6,938 18.1% 10,358 27.0% 9,723 25.3% 4,595 12.0% 1,091 2.8% 237 0.6% - 0.0% 38,382 100.0%  58.7  32 0.1% 107 0.3% 194 0.5% 429 1.1% 887 2.3% 2,166 5.6% 5,287 13.8% 8,737 22.8% 10,678 27.8% 6,730 17.5% 2,460 6.4% 675 1.8% | 876          |

| Male                                       | 16,308      | 42.5%   | 47,599,428  | 43.5%   |
|--|-------------|---------|-------------|---------|
| Female                                     | 22,074      | 57.5%   | 61,797,581  | 56.5%   |
| Total                                      | 38,382      | 100.0%  | 109,397,009 | 100.0%  |
| ion Option                                 |             |         |             |         |
| No Inflation                               | 2,774       | 7.2%    | 5,760,987   | 5.3%    |
| GPO  | 3,919       | 10.2%   | 10,103,303  | 9.2%    |
| 5% Simple Lifetime                         | 8,757       | 22.8%   | 24,064,751  | 22.0%   |
| 3% Compound Lifetime                       | 4,568       | 11.9%   | 11,517,219  | 10.5%   |
| 5% Compound - Double (14 years)            | 1,819       | 4.7%    | 4,811,522   | 4.4%    |
| 5% Compound Lifetime                       | 16,545      | 43.1%   | 53,139,227  | 48.6%   |
| Total                                      | 38,382      | 100.0%  | 109,397,009 | 100.0%  |
| Total                                      | 00,002      | 100.070 | 100,007,000 | 100.070 |
| nation Period                              |             |         |             |         |
| 30-Day                                     | 1,483       | 3.9%    | 4,995,181   | 4.6%    |
| 60-Day                                     | 3,789       | 9.9%    | 10,823,903  | 9.9%    |
| 90-Day                                     | 30,947      | 80.6%   | 87,528,240  | 80.0%   |
| 120-Day                                    | 645         | 1.7%    | 1,706,937   | 1.6%    |
| 180-Day                                    | 1,129       | 2.9%    | 3,448,745   | 3.2%    |
| 365-Day                                    | 389         | 1.0%    | 894,005     | 0.8%    |
| Total                                      | 38,382      | 100.0%  | 109,397,009 | 100.0%  |
| fit Period*                                |             |         |             |         |
| 1 Year                                     | 2           | 0.0%    | 6,006       | 0.0%    |
| 2 Years                                    | 2,029       | 5.3%    | 3,535,810   | 3.2%    |
| 3 Years                                    | 8,368       | 21.8%   | 19,763,999  | 18.1%   |
| 4 Years                                    | 6,478       | 16.9%   | 17,417,440  | 15.9%   |
| 5 Years                                    | 9,897       | 25.8%   | 29,210,053  | 26.7%   |
| 6 Years                                    | 7,102       | 18.5%   | 21,853,143  | 20.0%   |
| 10 Years                                   | 1,237       | 3.2%    | 4,977,289   | 4.5%    |
| Lifetime                                   | 3,269       | 8.5%    | 12,633,270  | 11.5%   |
| Total                                      | 38,382      | 100.0%  | 109,397,009 | 100.0%  |
| efit Period grouped to nearest primary ele | ection      |         |             |         |
| t a Batal                                  |             |         |             |         |
| ium Period<br>Lifetime                     | 27.026      | 06 59/  | 00 006 444  | 91.4%   |
|  | 37,036      | 96.5%   | 99,996,444  |         |
| Premium Paduction at Age 65                | 172         | 0.4%    | 949,899     | 0.9%    |
| Premium Reduction at Age 65 10-Pay         | 96<br>4 078 | 0.3%    | 299,124     | 0.3%    |
|  | 1,078       | 2.8%    | 8,151,543   | 7.5%    |

1.4%

1.1%

81.1%

16.4%

100.0%

1,145,739

88,584,078

18,693,222

109,397,009

973,969

1.0%

0.9%

81.0%

17.1%

100.0%

542

404

31,124

6,312

38,382

50%

75%

100%

150%

Total

| Issue | Sta | te |
|-------|-----|----|
|-------|-----|----|

| Issue State |            |        |                    |              |
|-------------|------------|--------|--------------------|--------------|
| AL          | 189        | 0.5%   | 547,906            | 0.5%         |
| AK          | 22         | 0.1%   | 71,604             | 0.1%         |
| AZ          | 384        | 1.0%   | 926,341            | 0.8%         |
| AR          | 71         | 0.2%   | 163,228            | 0.1%         |
| CA          | 5,438      | 14.2%  | 15,096,996         | 13.8%        |
| СО          | 704        | 1.8%   | 2,422,378          | 2.2%         |
| СТ          | 852        | 2.2%   | 3,438,161          | 3.1%         |
| DC          | 100        | 0.3%   | 338,107            | 0.3%         |
| DE          | 69         | 0.2%   | 214,425            | 0.2%         |
| FL          | 1,255      | 3.3%   | 3,651,043          | 3.3%         |
| GA          | 743        | 1.9%   | 2,075,822          | 1.9%         |
| GU          | 1          | 0.0%   | 1,916              | 0.0%         |
| НІ          | 161        | 0.4%   | 416,935            | 0.4%         |
| ID          | 81         | 0.2%   | 223,471            | 0.2%         |
| IL          | 3,177      | 8.3%   | 7,598,820          | 6.9%         |
| IN          | 570        | 1.5%   | 1,725,692          | 1.6%         |
| IA          | 550        | 1.4%   | 1,539,699          | 1.4%         |
| KS          | 565        | 1.5%   | 1,616,379          | 1.5%         |
| KY          | 278        | 0.7%   | 874,636            | 0.8%         |
| LA          | 454        | 1.2%   | 1,312,629          | 1.2%         |
| ME          | 240        | 0.6%   | 747,579            | 0.7%         |
| MD          | 1,070      | 2.8%   | 3,037,865          | 2.8%         |
| MA          | 1,494      | 3.9%   | 4,160,787          | 3.8%         |
| MI          | 444        | 1.2%   | 1,521,031          | 1.4%         |
| MN          | 1,275      | 3.3%   | 3,120,115          | 2.9%         |
| MS          | 1,273      | 0.4%   | 435,924            | 0.4%         |
| MO          | 672        | 1.8%   | 1,917,420          | 1.8%         |
| MT          |            | 0.6%   |                    |              |
| NE          | 239<br>331 | 0.6%   | 653,489<br>855,561 | 0.6%<br>0.8% |
| NV          |            |        |                    |              |
|             | 81         | 0.2%   | 278,829            | 0.3%         |
| NH          | 103        | 0.3%   | 429,789            | 0.4%         |
| NJ<br>NA    | 2,235      | 5.8%   | 6,907,798          | 6.3%         |
| NM          | 241        | 0.6%   | 595,655            | 0.5%         |
| NY          | 3,478      | 9.1%   | 11,367,531         | 10.4%        |
| NC          | 691        | 1.8%   | 1,841,452          | 1.7%         |
| ND          | 160        | 0.4%   | 412,868            | 0.4%         |
| OH          | 1,247      | 3.2%   | 3,666,602          | 3.4%         |
| OK          | 409        | 1.1%   | 1,158,138          | 1.1%         |
| OR          | 333        | 0.9%   | 1,156,931          | 1.1%         |
| PA          | 1,448      | 3.8%   | 3,912,041          | 3.6%         |
| RI          | 143        | 0.4%   | 366,415            | 0.3%         |
| SC          | 464        | 1.2%   | 1,445,785          | 1.3%         |
| SD          | 140        | 0.4%   | 411,346            | 0.4%         |
| TN          | 487        | 1.3%   | 1,306,650          | 1.2%         |
| TX          | 2,298      | 6.0%   | 5,580,220          | 5.1%         |
| UT          | 163        | 0.4%   | 416,991            | 0.4%         |
| VT          | 25         | 0.1%   | 67,178             | 0.1%         |
| VA          | 1,255      | 3.3%   | 3,042,224          | 2.8%         |
| WA          | 677        | 1.8%   | 2,042,631          | 1.9%         |
| WV          | 36         | 0.1%   | 95,026             | 0.1%         |
| WI          | 598        | 1.6%   | 1,891,299          | 1.7%         |
| WY          | 85         | 0.2%   | 297,645            | 0.3%         |
| Total       | 38,382     | 100.0% | 109,397,009        | 100.0%       |

| Risk | CI | as | S |
|------|----|----|---|
|------|----|----|---|

| red               | 13,350 | 34.8%  | 33,938,714  | 31.0%  |
|-------------------|--------|--------|-------------|--------|
| ard 1             | 22,873 | 59.6%  | 68,101,836  | 62.3%  |
| ard 2             | 1,993  | 5.2%   | 6,795,068   | 6.2%   |
| ard 3             | 166    | 0.4%   | 561,391     | 0.5%   |
|                   | 38,382 | 100.0% | 109,397,009 | 100.0% |
| t Option          |        |        |             |        |
|                   | 708    | 1.8%   | 3,442,623   | 3.1%   |
| ursement          | 37,473 | 97.6%  | 105,182,915 | 96.1%  |
|                   | 201    | 0.5%   | 771,471     | 0.7%   |
|                   | 38,382 | 100.0% | 109,397,009 | 100.0% |
| sure              |        |        |             |        |
|                   | 16,139 | 42.0%  | 44,784,892  | 40.9%  |
| ly                | 22,243 | 58.0%  | 64,612,117  | 59.1%  |
|                   | 38,382 | 100.0% | 109,397,009 | 100.0% |
| re Option         | 884    | 2.3%   | 3,110,284   | 2.8%   |
|                   | 37,498 | 97.7%  | 106,286,725 | 97.2%  |
|                   | 38,382 | 100.0% | 109,397,009 | 100.0% |
| Rider             |        |        |             |        |
|                   | 10,696 | 27.9%  | 27,641,838  | 25.3%  |
|                   | 27,686 | 72.1%  | 81,755,172  | 74.7%  |
|                   | 38,382 | 100.0% | 109,397,009 | 100.0% |
| o Rider           |        |        |             |        |
|                   | 535    | 1.4%   | 1,610,927   | 1.5%   |
|                   | 37,847 | 98.6%  | 107,786,082 | 98.5%  |
|                   | 38,382 | 100.0% | 109,397,009 | 100.0% |
| n EP Waiver Rider |        |        |             |        |
|                   | 2,545  | 6.6%   | 8,609,397   | 7.9%   |
|                   | 35,837 | 93.4%  | 100,787,612 | 92.1%  |
|                   | 38,382 | 100.0% | 109,397,009 | 100.0% |
| n EP Waiver Rider | 35,837 | 93.4%  | 100,787,612 | 92.    |

#### Appendix E The Prudential Insurance Company of America Pennsylvania Distribution of Inforce Business as of June 30, 2017 ILTC3

|                   | Count    | % of Count | Premium   | % of Premium |
|-------------------|----------|------------|-----------|--------------|
| Issue Year        |          |            |           |              |
| 2005              | 39       | 2.7%       | 84,114    | 2.2%         |
| 2006              | 226      | 15.6%      | 556,106   | 14.2%        |
| 2007              | 240      | 16.6%      | 571,188   | 14.6%        |
| 2008              | 219      | 15.1%      | 583,341   | 14.9%        |
| 2009              | 214      | 14.8%      | 634,052   | 16.2%        |
| 2010              | 296      | 20.4%      | 852,016   | 21.8%        |
| 2011              | 210      | 14.5%      | 619,256   | 15.8%        |
| 2012              | 4        | 0.3%       | 11,969    | 0.3%         |
| Total             | 1,448    | 100.0%     | 3,912,041 | 100.0%       |
| Issue Age         |          |            |           |              |
| <30               | 6        | 0.4%       | 8,251     | 0.2%         |
| 30-34             | 13       | 0.9%       | 17,691    | 0.5%         |
| 35-39             | 19       | 1.3%       | 30,520    | 0.8%         |
| 40-44             | 28       | 1.9%       | 65,764    | 1.7%         |
| 45-49             | 108      | 7.5%       | 225,205   | 5.8%         |
| 50-54             | 218      | 15.1%      | 488,967   | 12.5%        |
| 55-59             | 415      | 28.7%      | 1,029,977 | 26.3%        |
| 60-64             | 399      | 27.6%      | 1,137,393 | 29.1%        |
| 65-69             | 187      | 12.9%      | 650,889   | 16.6%        |
| 70-74             | 46       | 3.2%       | 206,351   | 5.3%         |
| 75-79             | 9        | 0.6%       | 51,033    | 1.3%         |
| 80+               | <u>.</u> | 0.0%       | 0         | 0.0%         |
| Total             | 1,448    | 100.0%     | 3,912,041 | 100.0%       |
| Average Issue Age | 59.4     |            |           |              |
| Attained Age      |          |            |           |              |
| <30               | 1        | 0.1%       | 1,436     | 0.0%         |
| 30-34             | 2        | 0.1%       | 1,653     | 0.0%         |
| 35-39             | 7        | 0.5%       | 7,371     | 0.2%         |
| 40-44             | 15       | 1.0%       | 23,511    | 0.6%         |
| 45-49             | 20       | 1.4%       | 37,456    | 1.0%         |
| 50-54             | 56       | 3.9%       | 128,605   | 3.3%         |
| 55-59             | 140      | 9.7%       | 302,763   | 7.7%         |
| 60-64             | 282      | 19.5%      | 686,560   | 17.5%        |
| 65-69             | 462      | 31.9%      | 1,202,499 | 30.7%        |
| 70-74             | 303      | 20.9%      | 916,955   | 23.4%        |
| 75-79             | 125      | 8.6%       | 445,899   | 11.4%        |
| 80+               | 35       | 2.4%       | 157,334   | 4.0%         |
| Total             | 1,448    | 100.0%     | 3,912,041 | 100.0%       |

| ender  |       |        |           |        |
|--|-------|--------|-----------|--------|
| Male   | 626   | 43.2%  | 1,722,691 | 44.0%  |
| Female                                       | 822   | 56.8%  | 2,189,350 | 56.0%  |
| Total  | 1,448 | 100.0% | 3,912,041 | 100.0% |
| lation Option                                |       |        |           |        |
| No Inflation                                 | 150   | 10.4%  | 288,111   | 7.4%   |
| GPO  | 210   | 14.5%  | 511,278   | 13.1%  |
| 5% Simple Lifetime                           | 558   | 38.5%  | 1,435,377 | 36.7%  |
| 3% Compound Lifetime                         | 113   | 7.8%   | 302,913   | 7.7%   |
| 5% Compound - Double (14 years)              | 112   | 7.7%   | 289,097   | 7.4%   |
| 5% Compound Lifetime                         | 305   | 21.1%  | 1,085,265 | 27.7%  |
| Total  | 1,448 | 100.0% | 3,912,041 | 100.0% |
| imination Period                             |       |        |           |        |
| 30-Day                                       | 68    | 4.7%   | 192,736   | 4.9%   |
| 60-Day                                       | 112   | 7.7%   | 298,611   | 7.6%   |
| 90-Day                                       | 1,170 | 80.8%  | 3,163,268 | 80.9%  |
| 120-Day                                      | 98    | 6.8%   | 257,427   | 6.6%   |
| 180-Day                                      | 0     | 0.0%   | 0         | 0.0%   |
| 365-Day                                      | 0     | 0.0%   | 0         | 0.0%   |
| Total  | 1,448 | 100.0% | 3,912,041 | 100.0% |
| enefit Period*                               |       |        |           |        |
| 1 Year                                       | 0     | 0.0%   | 0         | 0.0%   |
| 2 Years                                      | 127   | 8.8%   | 261,590   | 6.7%   |
| 3 Years                                      | 392   | 27.1%  | 938,211   | 24.0%  |
| 4 Years                                      | 269   | 18.6%  | 714,320   | 18.3%  |
| 5 Years                                      | 317   | 21.9%  | 999,801   | 25.6%  |
| 6 Years                                      | 247   | 17.1%  | 604,140   | 15.4%  |
| 10 Years                                     | 23    | 1.6%   | 84,696    | 2.2%   |
| Lifetime                                     | 73    | 5.0%   | 309,283   | 7.9%   |
| Total  | 1,448 | 100.0% | 3,912,041 | 100.0% |
| enefit Period grouped to nearest primary ele |       |        |           |        |
| Lifetime                                     | 1,441 | 99.5%  | 3,886,951 | 99.4%  |
| Premium Paid-Up at Age 65                    | 0     | 0.0%   | 0,000,931 | 0.0%   |
| Premium Reduction at Age 65                  | 7     | 0.5%   | 25,090    | 0.6%   |
| r romain recodolion at rigo oo               | ,     | 0.070  | 20,000    | 0.070  |
| 10-Pay                                       | 0     | 0.0%   | 0         | 0.0%   |

#### Home Health Reimbursement Level

| 50%   | 29    | 2.0%   | 47,905    | 1.2%   |  |
|-------|-------|--------|-----------|--------|--|
| 75%   | 13    | 0.9%   | 44,803    | 1.1%   |  |
| 100%  | 1,068 | 73.8%  | 2,922,884 | 74.7%  |  |
| 150%  | 338   | 23.3%  | 896,449   | 22.9%  |  |
| Total | 1,448 | 100.0% | 3,912,041 | 100.0% |  |

| Risk Class                  |       |        |           |        |
|-----------------------------|-------|--------|-----------|--------|
| Preferred                   | 447   | 30.9%  | 1,070,282 | 27.4%  |
| Standard 1                  | 885   | 61.1%  | 2,481,611 | 63.4%  |
| Standard 2                  | 110   | 7.6%   | 342,380   | 8.8%   |
| Standard 3                  | 6     | 0.4%   | 17,768    | 0.5%   |
| Total                       | 1,448 | 100.0% | 3,912,041 | 100.0% |
| Cash Benefit Option         |       |        |           |        |
| Cash                        | 13    | 0.9%   | 51,709    | 1.3%   |
| Reimbursement               | 1,432 | 98.9%  | 3,853,022 | 98.5%  |
| Flex                        | 3     | 0.2%   | 7,310     | 0.2%   |
| Total                       | 1,448 | 100.0% | 3,912,041 | 100.0% |
| Benefit Measure             |       |        |           |        |
| Daily                       | 505   | 34.9%  | 1,404,063 | 35.9%  |
| Monthly                     | 943   | 65.1%  | 2,507,978 | 64.1%  |
| Total                       | 1,448 | 100.0% | 3,912,041 | 100.0% |
| Non-Forfeiture Option       |       |        |           |        |
| Yes                         | 33    | 2.3%   | 77,676    | 2.0%   |
| No                          | 1,415 | 97.7%  | 3,834,365 | 98.0%  |
| Total                       | 1,448 | 100.0% | 3,912,041 | 100.0% |
| Shared Care Rider           |       |        |           |        |
| Yes                         | 425   | 29.4%  | 997,889   | 25.5%  |
| No                          | 1,023 | 70.6%  | 2,914,152 | 74.5%  |
| Total                       | 1,448 | 100.0% | 3,912,041 | 100.0% |
| Survivorship Rider          |       |        |           |        |
| Yes                         | 23    | 1.6%   | 79,446    | 2.0%   |
| No                          | 1,425 | 98.4%  | 3,832,595 | 98.0%  |
| Total                       | 1,448 | 100.0% | 3,912,041 | 100.0% |
| Home Health EP Waiver Rider |       |        |           |        |
| Yes                         | 30    | 2.1%   | 117,311   | 3.0%   |
| No                          | 1,418 | 97.9%  | 3,794,730 | 97.0%  |
| Total                       | 1,448 | 100.0% | 3,912,041 | 100.0% |
|                             |       |        |           |        |